

03013

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

RHONDA MITTS,

Plaintiff,

Vs.

COSTCO WHOLESALE CORPORATION,

Defendant.

Costco Wholesale Corporation:

No.

2016L004430
CALENDAR/ROOM D
TIME 00:00
Premises Liability

C/o C T Corporation System Registered Agent: 208 S.
Lasalle Suite 814 Chicago, Illinois 60604

SUMMONS**TO EACH DEFENDANT:**

YOU ARE SUMMONED and required to file an answer in this case or otherwise file your appearance in the office of the Clerk of this Court located in the Richard J. Daley Center, Room 801, Chicago, Illinois, within thirty (30) days after service of this Summons, not counting the day of service. ***IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT, A COPY OF WHICH IS ATTACHED HERETO.***

TO THE OFFICER:

This summons must be returned by the officer or person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

DOROTHY BROWN
CLERK OF CIRCUIT COURT

WITNESS _____, 2015

MAY 03 2016

03013

BENJAMIN AND SHAPIRO, LTD.

Attorneys for the Plaintiff

180 North LaSalle Street

Chicago, Illinois 60601

Phone: (312) 641-5944

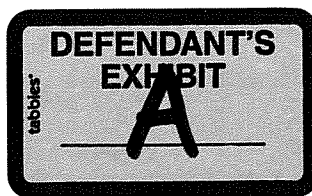
CLERK OF THE COURT

DATE OF SERVICE: 5/9/16

(To be inserted on copy left with Defendant or other

person)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY





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DIE DATE
05/27/2016

DOC.TYPE: LAW
CASE NUMBER: 16L004430
DEFENDANT
COSTCO WHOLESALE CORPORATION
208 S LASALLE
CHICAGO, IL 60604
SUITE 814

SERVICE INF
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DOROTHY BROWN

WITNESS _____, 2015

MAY 03 2016

03013

BENJAMIN AND SHAPIRO, LTD.

Attorneys for the Plaintiff

180 North LaSalle Street

Chicago, Illinois 60601

Phone: (312) 641-5944

CLERK OF THE COURT

DATE OF SERVICE: _____

(To be inserted on copy left with Defendant or other

person)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY

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COMPLAINT

Now comes the Plaintiff, RHONDA MITTS, by and through her attorneys, BENJAMIN AND SHAPIRO, LTD., and complains of the Defendant, COSTCO WHOLESALE CORPORATION, as follows:

1. That on the 13th day of July, 2014, the Defendant, COSTCO WHOLESALE CORPORATION, owned the premises located at 1320 S. Route 59, Naperville, Dupage County, Illinois, including, but not limited to, aisles therein.

2. That on the 13th day of July, 2014, the Defendant, COSTCO WHOLESALE CORPORATION, operated the premises located at 1320 S. Route 59, Naperville, Dupage County, Illinois, including, but not limited to, aisles therein.

3. That on the 13th day of July, 2014, the Defendant, COSTCO WHOLESALE CORPORATION, controlled the premises located at 1320 S. Route 59, Naperville, Dupage County, Illinois, including, but not limited to, aisles therein.

4. That on the 13th day of July, 2014, the Defendant, COSTCO WHOLESALE CORPORATION, managed the premises located at 1320 S. Route 59, Naperville, Dupage

County, Illinois, including, but not limited to, aisles therein.

5. That on the 13th day of July, 2014, the Defendant, COSTCO WHOLESALE CORPORATION, maintained the premises located at 1320 S. Route 59, Naperville, Dupage County, Illinois, including, but not limited to, aisles therein.

6. That at all times herein mentioned the Plaintiff, RHONDA MITTS, was lawfully on said premises.

7. That at all times herein mentioned the Defendant owed a duty to the Plaintiff to operate said premises so that the Plaintiff would not be injured.

8. That at the time and place aforesaid the Defendant, COSTCO WHOLESALE CORPORATION, individually and through its agents and employees, was then and there guilty of one or more of the following wrongful acts or omissions:

a. Carelessly and negligently operated, managed, maintained and controlled said premises, including the aisles therein;

b. Carelessly and negligently allowed the aisles to be and remain in an unsafe condition although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking;

c. Carelessly and negligently allowed debris to be on the floor in the aisles therein although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking;

d. Carelessly and negligently failed to remove the debris in the aisle although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking;

e. Failed to provide the Plaintiff with a safe place to walk;

f. Failed to warn the Plaintiff of the dangerous

condition of the aisle therein although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking.

9. That as a direct and proximate result thereof the Plaintiff, RHONDA MITTS, was caused to trip and fall due to the debris.

10. That as a direct and proximate result thereof the Plaintiff, RHONDA MITTS, was injured in her head, body and limbs, both internally and externally and she suffered bodily pain and injury and mental anguish from then until now and will continue so to suffer in the future; that she has expended and will in the future be compelled to expend large sums of money in endeavoring to be cured of her said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow his usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, RHONDA MITTS, prays this Honorable court for Judgment against the Defendant, COSTCO WHOLESALE CORPORATION, in such sum of money in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, which shall constitute fair and reasonable compensation for Plaintiff's injuries.

COREY A. BENJAMIN
Attorney for Plaintiff

03013
BENJAMIN AND SHAPIRO, LTD.
180 North LaSalle Street, 2600
Chicago, Illinois 60601
312-641-5944

kd

RHONDA MITTS,

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The undersigned, one of the Attorneys for the Plaintiffs herein, states that this is a civil

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil

COREY A. BENJAMIN

03013

180 North LaSalle Street

Phone: (312) 641-5944